

Preaward Compliance Review Report for All Applicants and Recipients Requesting EPA Financial Assistance

Note: Read Instructions before completing form.

I. A. Applicant/Recipient (Name, Address, City, State, Zip Code)

Name:

Address:

City:

State: Zip Code:

B. DUNS No.

II. Is the applicant currently receiving EPA Assistance? ☐ Yes ☒ No

III. List all civil rights lawsuits and administrative complaints pending against the applicant/recipient that allege discrimination based on race, color, national origin, sex, age, or disability. (Do not include employment complaints not covered by 40 C.F.R. Parts 5 and 7.)

IV. List all civil rights lawsuits and administrative complaints decided against the applicant/recipient within the last year that allege discrimination based on race, color, national origin, sex, age, or disability and enclose a copy of all decisions. Please describe all corrective actions taken. (Do not include employment complaints not covered by 40 C.F.R. Parts 5 and 7.)

V. List all civil rights compliance reviews of the applicant/recipient conducted by any agency within the last two years and enclose a copy of the review and any decisions, orders, or agreements based on the review. Please describe any corrective action taken. (40 C.F.R. § 7.80(c)(3))

VI. Is the applicant requesting EPA assistance for new construction? If no, proceed to VII; if yes, answer (a) and/or (b) below.

☐ Yes ☒ No

a. If the grant is for new construction, will all new facilities or alterations to existing facilities be designed and constructed to be readily accessible to and usable by persons with disabilities? If yes, proceed to VII; if no, proceed to VI(b).

☐ Yes ☐ No

b. If the grant is for new construction and the new facilities or alterations to existing facilities will not be readily accessible to and usable by persons with disabilities, explain how a regulatory exception (40 C.F.R. 7.70) applies.

VII. Does the applicant/recipient provide initial and continuing notice that it does not discriminate on the basis of race, color, national origin, sex, age, or disability in its program or activities? (40 C.F.R. 5.140 and 7.95)

☒ Yes ☐ No

a. Do the methods of notice accommodate those with impaired vision or hearing?

☒ Yes ☐ No

b. Is the notice posted in a prominent place in the applicant's offices or facilities or, for education programs and activities, in appropriate periodicals and other written communications?

☒ Yes ☐ No

c. Does the notice identify a designated civil rights coordinator?

☒ Yes ☐ No

VIII. Does the applicant/recipient maintain demographic data on the race, color, national origin, sex, age, or handicap of the population it serves? (40 C.F.R. 7.85(a))

☒ Yes ☐ No

IX. Does the applicant/recipient have a policy/procedure for providing access to services for persons with limited English proficiency? (40 C.F.R. Part 7, E.O. 13166)

☒ Yes ☐ No

- X. If the applicant is an education program or activity, or has 15 or more employees, has it designated an employee to coordinate its compliance with 40 C.F.R. Parts 5 and 7? Provide the name, title, position, mailing address, e-mail address, fax number, and telephone number of the designated coordinator.**

James Adams, Health commissioner, 420 Market Ave., N, Canton, OH 44702. Fax: 330-489-3335, Phone: 330-438-4623.

- XI. If the applicant is an education program or activity, or has 15 or more employees, has it adopted grievance procedures that assure the prompt and fair resolution of complaints that allege a violation of 40 C.F.R. Parts 5 and 7? Provide a legal citation or Internet Address for, or a copy of, the procedures.**

Canton City Health Codes 203.11, 205.10, 207.07, 207.33, and 207.05 located at: <https://cantonhealth.org/pdf/Canton%20City%20Health%20Code%20updated%20December%202015,%202021.pdf>
Policies 800-040-P EEO and Affirmative Action, 800-037-P Health Equity, 800-027-P Public Health Ethical Practices, and 800-021-P Cultural and Linguistic Standards located at: <http://www.cantonhealth.org/?pg=355>

For the Applicant/Recipient

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. I assure that I will fully comply with all applicable civil rights statutes and EPA regulations.

A. Signature of Authorized Official

Linda Morckel

B. Title of Authorized Official

APC Monitoring & Inspections Supervisor

C. Date

03/24/2022

For the U.S. Environmental Protection Agency

I have reviewed the information provided by the applicant/recipient and hereby certify that the applicant/recipient has submitted all preaward compliance information required by 40 C.F.R. Parts 5 and 7; that based on the information submitted, this application satisfies the preaward provisions of 40 C.F.R. Parts 5 and 7; and that the applicant has given assurance that it will fully comply with all applicable civil rights statutes and EPA regulations.

A. *Signature of Authorized EPA Official

B. Title of Authorized Official

C. Date

*** See Instructions**

Instructions for EPA FORM 4700-4 (Rev. 06/2014)

General. Recipients of Federal financial assistance from the U.S. Environmental Protection Agency must comply with the following statutes and regulations.

Title VI of the Civil Rights Acts of 1964 provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The Act goes on to explain that the statute shall not be construed to authorize action with respect to any employment practice of any employer, employment agency, or labor organization (except where the primary objective of the Federal financial assistance is to provide employment). Section 13 of the 1972 Amendments to the Federal Water Pollution Control Act provides that no person in the United States shall on the ground of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under the Federal Water Pollution Control Act, as amended. Employment discrimination on the basis of sex is prohibited in all such programs or activities. Section 504 of the Rehabilitation Act of 1973 provides that no otherwise qualified individual with a disability in the United States shall solely by reason of disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Employment discrimination on the basis of disability is prohibited in all such programs or activities. The Age Discrimination Act of 1975 provides that no person on the basis of age shall be excluded from participation under any program or activity receiving Federal financial assistance. Employment discrimination is not covered. Age discrimination in employment is prohibited by the Age Discrimination in Employment Act administered by the Equal Employment Opportunity Commission. Title IX of the Education Amendments of 1972 provides that no person in the United States on the basis of sex shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance. Employment discrimination on the basis of sex is prohibited in all such education programs or activities. Note: an education program or activity is not limited to only those conducted by a formal institution. 40 C.F.R. Part 5 implements Title IX of the Education Amendments of 1972. 40 C.F.R. Part 7 implements Title VI of the Civil Rights Act of 1964, Section 13 of the 1972 Amendments to the Federal Water Pollution Control Act, and Section 504 of The Rehabilitation Act of 1973. The Executive Order 13166 (E.O. 13166) entitled; "Improving Access to Services for Persons with Limited English Proficiency" requires Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Items "Applicant" means any entity that files an application or unsolicited proposal or otherwise requests EPA assistance. 40 C.F.R. §§ 5.105, 7.25. "Recipient" means any entity, other than applicant, which will actually receive EPA assistance. 40 C.F.R. §§ 5.105, 7.25. "Civil rights lawsuits and administrative complaints" means any lawsuit or administrative complaint alleging discrimination on the basis of race, color, national origin, sex, age, or disability pending or decided against the applicant and/or entity which actually benefits from the grant, but excluding employment complaints not covered by 40 C.F.R. Parts 5 and 7. For example, if a city is the named applicant but the grant will actually benefit the Department of Sewage, civil rights lawsuits involving both the city and the Department of Sewage should be listed. "Civil rights compliance review" means any review assessing the applicant's and/or recipient's compliance with laws prohibiting discrimination on the basis of race, color, national origin, sex, age, or disability. Submit this form with the original and required copies of applications, requests for extensions, requests for increase of funds, etc. Updates of information are all that are required after the initial application submission. If any item is not relevant to the project for which assistance is requested, write "NA" for "Not Applicable." In the event applicant is uncertain about how to answer any questions, EPA program officials should be contacted for clarification. * Note: Signature appears in the Approval Section of the EPA Comprehensive Administrative Review For Grants/Cooperative Agreements & Continuation/Supplemental Awards form.

Project Narrative File(s)

* Mandatory Project Narrative File Filename:

Add Mandatory Project Narrative File

Delete Mandatory Project Narrative File

View Mandatory Project Narrative File

To add more Project Narrative File attachments, please use the attachment buttons below.

Add Optional Project Narrative File

Delete Optional Project Narrative File

View Optional Project Narrative File

Other Attachment File(s)

* Mandatory Other Attachment Filename:

Add Mandatory Other Attachment

Delete Mandatory Other Attachment

View Mandatory Other Attachment

To add more "Other Attachment" attachments, please use the attachment buttons below.

Add Optional Other Attachment

Delete Optional Other Attachment

View Optional Other Attachment



EPA KEY CONTACTS FORM

OMB Number: 2030-0020
Expiration Date: 06/30/2024

Authorized Representative: *Original awards and amendments will be sent to this individual for review and acceptance, unless otherwise indicated.*

Name:	Prefix: Ms.	First Name: Linda	Middle Name:
	Last Name: Morckel	Suffix:	
Title:	APC Monitoring & Inspections Supervisor		
Complete Address:			
Street1:	420 Market Ave N		
Street2:			
City:	Canton	State:	OH: Ohio
Zip / Postal Code:	44702	Country:	USA: UNITED STATES
Phone Number:	330-438-4665	Fax Number:	
E-mail Address:	lmorckel@cantonhealth.org		

Payee: *Individual authorized to accept payments.*

Name:	Prefix: Ms.	First Name: Christi	Middle Name:
	Last Name: Allen	Suffix:	
Title:	Fiscal Officer		
Complete Address:			
Street1:	420 Market Ave N		
Street2:			
City:	Canton	State:	OH: Ohio
Zip / Postal Code:	44702	Country:	USA: UNITED STATES
Phone Number:	330-438-4675	Fax Number:	
E-mail Address:	callen@cantonhealth.org		

Administrative Contact: *Individual from Sponsored Programs Office to contact concerning administrative matters (i.e., indirect cost rate computation, rebudgeting requests etc).*

Name:	Prefix: Ms.	First Name: Linda	Middle Name:
	Last Name: Morckel	Suffix:	
Title:	APC Monitoring & Inspections Supervisor		
Complete Address:			
Street1:	420 Market Ave N		
Street2:			
City:	Canton	State:	OH: Ohio
Zip / Postal Code:	44702	Country:	USA: UNITED STATES
Phone Number:	330-438-4665	Fax Number:	
E-mail Address:	lmorckel@cantonhealth.org		

EPA KEY CONTACTS FORM

Project Manager: *Individual responsible for the technical completion of the proposed work.*

Name: **Prefix:**

First Name:

Middle Name:

Last Name:

Suffix:

Title:

Complete Address:

Street1:

Street2:

City:

State:

Zip / Postal Code:

Country:

Phone Number:

Fax Number:

E-mail Address:

BUDGET INFORMATION - Non-Construction Programs

OMB Number: 4040-0006
Expiration Date: 02/28/2022

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Enhanced Air Quality Monitoring for Communities	66.034	\$	\$	302,775.00	0.00	302,775.00
2.						
3.						
4.						
5. Totals		\$	\$	302,775.00	0.00	302,775.00

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SECTION B - BUDGET CATEGORIES

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1)	(2)	(3)	(4)	
	Enhanced Air Quality Monitoring for Communities				
a. Personnel	\$ 42,197.00	\$	\$	\$	\$ 42,197.00
b. Fringe Benefits	17,971.00				17,971.00
c. Travel	0.00				0.00
d. Equipment	177,588.00				177,588.00
e. Supplies	26,124.00				26,124.00
f. Contractual	0.00				0.00
g. Construction	0.00				0.00
h. Other	38,895.00				38,895.00
i. Total Direct Charges (sum of 6a-6h)	302,775.00				\$ 302,775.00
j. Indirect Charges	0.00				\$ 0.00
k. TOTALS (sum of 6i and 6j)	\$ 302,775.00	\$	\$	\$	\$ 302,775.00
7. Program Income	\$ 0.00	\$	\$	\$	\$ 0.00

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SECTION C - NON-FEDERAL RESOURCES				
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e)TOTALS
8. Enhanced Air Quality Monitoring for Communities	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
9.				
10.				
11.				
12. TOTAL (sum of lines 8-11)	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

SECTION D - FORECASTED CASH NEEDS					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$ 254,939.00	\$ 216,869.00	\$ 18,833.00	\$ 10,119.00	\$ 9,118.00
14. Non-Federal	\$ 0.00	0.00	0.00	0.00	0.00
15. TOTAL (sum of lines 13 and 14)	\$ 254,939.00	\$ 216,869.00	\$ 18,833.00	\$ 10,119.00	\$ 9,118.00

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT				
(a) Grant Program	FUTURE FUNDING PERIODS (YEARS)			
	(b)First	(c) Second	(d) Third	(e) Fourth
16. Enhanced Air Quality Monitoring for Communities	\$ 254,939.00	\$ 34,412.00	\$ 13,424.00	\$ 0.00
17.				
18.				
19.				
20. TOTAL (sum of lines 16 - 19)	\$ 254,939.00	\$ 34,412.00	\$ 13,424.00	\$ 0.00

SECTION F - OTHER BUDGET INFORMATION	
21. Direct Charges: See project narrative for explanation of charges	22. Indirect Charges:
23. Remarks:	

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Manifest for Grant Application # GRANT13579774

Grant Application XML file (total 1):

1. GrantApplication.xml. (size 23208 bytes)

Forms Included in Zip File(total 6):

1. Form ProjectNarrativeAttachments_1_2-V1.2.pdf (size 16109 bytes)

2. Form SF424_3_0-V3.0.pdf (size 24142 bytes)

3. Form SF424A-V1.0.pdf (size 23087 bytes)

4. Form EPA4700_4_3_0-V3.0.pdf (size 22917 bytes)

5. Form OtherNarrativeAttachments_1_2-V1.2.pdf (size 15910 bytes)

6. Form EPA_KeyContacts_2_0-V2.0.pdf (size 37305 bytes)

Attachments Included in Zip File (total 3):

1. OtherNarrativeAttachments_1_2 OtherNarrativeAttachments_1_2-Attachments-1236-
Partnership Letters combined.pdf application/pdf (size 4289954 bytes)

2. ProjectNarrativeAttachments_1_2 ProjectNarrativeAttachments_1_2-Attachments-1234-
Project Narrative.pdf application/pdf (size 853822 bytes)

3. OtherNarrativeAttachments_1_2 OtherNarrativeAttachments_1_2-Attachments-1235-CCPH
Quality Assurance Statement.pdf application/pdf (size 552242 bytes)

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

03/24/2022

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Canton City Public Health

* b. Employer/Taxpayer Identification Number (EIN/TIN):

34-6000504

* c. Organizational DUNS:

9422935230000

d. Address:

* Street1:

420 Market Ave N

Street2:

* City:

Canton

County/Parish:

* State:

OH: Ohio

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

44702-1544

e. Organizational Unit:

Department Name:

Division Name:

Air Pollution Control

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

* First Name:

Linda

Middle Name:

* Last Name:

Morckel

Suffix:

Title:

APC Monitoring & Inspections Supervisor

Organizational Affiliation:

* Telephone Number:

330-438-4665

Fax Number:

* Email:

lmorckel@cantonhealth.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.034

CFDA Title:

Surveys, Studies, Research, Investigations, Demonstrations, and Special Purpose Activities
Relating to the Clean Air Act

* 12. Funding Opportunity Number:

EPA-OAR-OAQPS-22-01

* Title:

Enhanced Air Quality Monitoring for Communities

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

CCPH Expanded Air Monitoring to inform and engage community and to identify and quantify
pollutants in the overburdened community near Steel Manufacturer.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

Ohio 7

* b. Program/Project

Ohio 7

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

12/01/2022

* b. End Date:

11/30/2025

18. Estimated Funding (\$):

* a. Federal	302,775.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	302,775.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Linda

Middle Name:

* Last Name:

Morckel

Suffix:

* Title:

APC Monitoring & Inspections Supervisor

* Telephone Number:

330-438-4665

Fax Number:

* Email:

lmorckel@cantonhealth.org

* Signature of Authorized Representative:

Linda Morckel

* Date Signed:

03/24/2022

QUALITY ASSURANCE STATEMENT

CCPH Expanded Air Monitoring near Steel Manufacturer

Canton City Public Health's Air Pollution Control Division performs ambient air monitoring in compliance with the QA Requirements outlined in Appendix A of 40 CFR 58 and Appendix D of QA Handbook II. Since our ultimate goal is to collect defensible data, data is invalidated if quality is not maintained. Although the monitors in this project will be used for study purposes only, CCPH will operate them as if they are SLAMS monitors. All quality assurance (QA) and quality control (QC) activities are performed using standards traceable to NIST (National Institute of Standards and Technology). Standards are NIST-certified annually. All air monitoring activities are meticulously documented in logbooks specific to the monitor or sensor being used.

PM_{2.5} and PM₁₀ FEM (assumed to be T640X for this narrative) – Upon receipt, the instrument will run in the CCPH lab for several days to verify proper operation. Diagnostics will be recorded and QC will be performed on temperature, barometric pressure, and flow.

Calibration: Upon relocating the monitor to the site, the temperature, barometric pressure, and flow will be verified against a NIST-traceable standard and calibrated as necessary (note: temperature cannot be calibrated). PMT (span dust) check will be performed and adjusted if needed. If any adjustments are made, QC will be repeated before collecting ambient data. Calibration will be repeated at least annually and more often as needed.

One-point Flow Rate Verifications: Flow verifications are required to be performed monthly. A flow rate verification must be less than +/-4.1% of the 5.0 LPM design flow rate. If the verification fails to meet this criteria, data will be invalidated back to the previous passing flow rate verification.

Semi-Annual Flow Rate Audit: This audit will be performed on the PM_{2.5}/PM₁₀ sampler twice per year by an Ohio EPA auditor (ideally spaced 5-7 months apart). While the state auditor is on site, he will also review logbooks and compare the site to the siting criteria in the CFR.

Purple Airs – Purple Air sensors cannot be calibrated post-production, nor can QC be performed on them. Upon receipt, CCPH will operate the sensors in the laboratory and compare data between them to document how closely they match each other before they are deployed. Sensors will be cleaned per manufacturer's instructions as needed.

SO₂ FEM (assumed to be T100) – Upon receipt, the instrument will run in the CCPH lab for several days to verify that it is in working order. Diagnostics will be recorded and QC will be performed.

Multi-point Calibrations: Upon relocating to the site, a multi-point calibration/verification will be performed on the unit. If an adjustment is needed, quality control points will be repeated before ambient data is collected. A multi-point calibration/verification will be performed twice per year, more often as needed.

Zero/Precision/Span Checks: Quality Control checks will be completed at a minimum of every 2 weeks using EPA Protocol gas, a NIST-certified Dilution Calibrator, and Zero Air System. Results must meet the criteria as outlined in Appendix D of the QA Handbook II.

Annual Performance Analyzer Audit: Ohio EPA will perform an annual audit of the SO₂ FEM analyzer and results must meet the criteria specified in Appendix D of the QA Handbook II. The auditor will also review logbooks and compare the site to the siting criteria of the CFR.

Multi-RAEs – Bump tests will be performed in a fresh air environment each day of use. At least quarterly, CCPH staff will calibrate the SO₂ sensor using the EPA-protocol gas used for calibration of the FEM monitor.

VOCs –

TO-15: CCPH will hire a reputable laboratory to perform TO-15 analysis. Quality control results will be reviewed at regular intervals by CCPH and trip blanks will be provided and analyzed as requested. All samples will be documented in the VOC logbook specific for this project with detailed information such as set up date and time, run date, canister number, and pick up date and time. All samples will be transported with a Chain of Custody.

Multi-RAEs – Bump tests will be performed in a fresh air environment each day of use. At least quarterly, CCPH staff will calibrate the VOC sensor with a known concentration of Isobutylene.

Shelter temperature – Shelter temperature of the trailer will be monitored and reviewed every morning to assure that monitoring equipment is operating within the temperature range required by the manufacturer and listed in Appendix D of the QA Handbook II. Adjustments will be made to the heating and cooling unit as needed to maintain the required temperature range.

CCPH Expanded Air Monitoring near Steel Manufacturer

Canton City Public Health
420 Market Ave N
Canton, OH 44702

Contact: Linda Morckel

Ex. 6 Personal Privacy (PP)

lmorckel@cantonhealth.org

DUNS #9422935230000

No Set-aside

Canton City Public Health works to prevent the spread of disease,
promote health and protect the public from harm.
Its Air Pollution Control Division provides air monitoring throughout all of Stark County,
including Lead monitoring near a Steel Manufacturer in Canton, Ohio.

Project Partners: City of Canton, Residents of Canton and Canton Township living near Steel Manufacturer,
Canton Township, Ohio EPA

Project Location: Neighborhoods immediately SW and SE of Steel Manufacturer

Target Air Pollutants: PM_{2.5}, PM₁₀, SO₂, VOCs

Budget Summary

EPA Funding Requested	Total Project Cost
\$302,775	\$302,775

Project Period: December 1, 2022 – November 30, 2025

Canton City Public Health and residents will work together to identify and quantify pollutants in the communities closest to a Steel Manufacturer in Canton, Ohio. Using FEM technology and sensors, concentrations of target air pollutants will be collected, assessed and shared on a routine and frequent basis. This project will foster a relationship of trust with this overburdened community.

ELIGIBILITY

As a local government agency, Canton City Public Health (CCPH) [aka Canton City Health Department] is eligible to apply for the 'Enhanced Air Quality Monitoring for Communities' grant as described in RFA Number EPA-OAR-OAQPS-22-01, Assistance Listing No. 66.034. This application complies with the application submission instructions and application content requirements set forth in Section IV and Appendices A and B of said RFA. This application is being submitted through Grants.gov on or before the application submission deadline of March 25, 2022.

Section 1 – Project Summary and Approach

Because the focus of this project has a history dating back several years, it is necessary to provide some background to put its significance into perspective.

The steel manufacturer, Republic Steel, has been located in Canton Ohio for decades. On December 2, 2016, an air permit was issued that provided an emission limit of greater than 0.5 ton of lead per year. Pursuant to 40 CFR Part 58, Subpart B, 58.10(a)(4), this triggered the requirement to establish a source-oriented lead ambient air monitoring site. Using capture efficiencies reported by the facility, dispersion modeling was performed to optimize the location of the monitoring site. The permit required that the monitoring site be operational no later than 6 months after the permit was issued. Construction began in Spring 2017 with plans to begin collecting samples no later than the first week of June 2017.

Although the Air Pollution Control (APC) division of CCPH has historically received complaints regarding Republic Steel, the number of complaints increased markedly in March 2017. From March through December 2017, 28 complaints were received – 22 regarding particulates on personal property and 6 regarding odors. CCPH hosted a public meeting on this topic on April 4, 2017 with approximately 70 people in attendance. The residents voiced many concerns including exposure to lead, elevated death and cancer rates, nuisance odors, poor air quality affecting their health, and fallout of particulates on personal property. Since then, Canton APC has received 69 additional complaints regarding Republic Steel. Since 2017, CCPH has hosted five public meetings, with the most recent in November 2021, and has taken many actions to address the residents' concerns, including a cancer cluster study, a death rate study, soil testing, microscopic examinations of particulates, blood lead testing, and addressing violations at the facility. At the request of CCPH, Ohio Department of Health is currently working on a Public Health Assessment through their ASTDR program for communities in close proximity to Republic Steel.

The microscale ambient air monitoring site was completed in June 2017 and the lead concentration from the first TSP filter collected on June 6, 2017 was $0.714 \mu\text{g}/\text{m}^3$. The first 3-month rolling average that exceeded the NAAQS was $0.196 \mu\text{g}/\text{m}^3$ (March-May 2018). CCPH continues to operate the Republic site, collecting 15 samples per month, and the 3-month rolling average has exceeded the lead NAAQS 11 times. Due to this persistent problem, CCPH is installing a second ambient air monitoring site (called Georgetown) closer to the residential neighborhoods. This site will host two TSP samplers that will operate on the same 15 days each month as those at the Republic site and is scheduled to be in operation no later than March 31, 2022.

Based on complaints received and public meetings that have occurred from 2017 to present day, CCPH knows the residents living near Republic Steel, an underserved community, are concerned about disproportionate and adverse health outcomes of poor air quality from lead emissions, PM (fallout on personal property), and SO₂/VOCs (odors). The continuation of complaints, facility non-compliance, and community concerns of poor air quality affecting their health is an urgent matter. If awarded funds from the American Rescue Plan competitive grant, the Air Pollution Control Division of CCPH, the existing air monitoring agency for the area, will implement a two-year study of the following pollutants that are currently not being monitored to address community concerns:

PM₁₀ and PM_{2.5}: Microscopic analyses of particulates scraped from vehicle windshields show that many particles are magnetized, smaller than $10 \mu\text{g}$, and spherical. Specifically, they "appear to be consistent with by-products from an

iron incorporating high heat/combustion manufacturing process.”¹ Noticeable fallout of particulates occurs several times each year when wind is blowing from Republic Steel toward the residential neighborhoods.

SO₂: When Republic Steel performed a stack test on their melt shop baghouse in 2021, they exceeded their limit for SO₂ and needed to retest. They have since reduced their SO₂ emissions from that source but other SO₂ sources, such as the Vacuum Tank Degasser, exist. Since some complaints describe odors as a ‘burning brakes’ smell and CCPH has experienced strong sulfur odors onsite, they may be SO₂-related.

VOCs: Since many odors are caused by VOCs and CCPH staff has detected odors that can be characterized as ‘mothball-like’, canister sampling will be initiated on a 1-in-6 US EPA schedule to determine if they are sources of odor. Analysis will be performed by a private contractor.

The two-year study will involve the use of FEM air monitoring equipment and smaller, less costly sensors that would be placed with Community Operators (COs) chosen by the community. The FEM equipment will be added to the new Georgetown site and will be operated and maintained by staff of the APC division at CCPH. Purchases related to the FEM air monitoring performed at the Georgetown site include:

- Teledyne T100 continuous monitor or comparable **equipment to monitor SO₂**
- Teledyne T640X continuous monitor or comparable **equipment to monitor PM_{2.5} and PM₁₀**
- **TO-15 canister sampling** to analyze for VOCs (involves rental of equipment and analysis by contracted vendor with no more than a 10-day turn-around time). A **timer** will be purchased with grant funds to collect samples from midnight to midnight on the US EPA 1-in-6 sampling schedule.
- Since the T100 SO₂ analyzer needs to be housed in a climate-controlled shelter, CCPH will purchase a **small semi-mobile shelter** to house the continuous analyzers and calibration/Quality Control (QC) equipment. The semi-mobile shelter would allow for easy relocation and reuse as needed after this grant cycle ends.
- T700 Dynamic Dilution Calibrator or comparable **equipment to calibrate SO₂ and perform QC**
- T701 Zero Air System or comparable **equipment to provide zero air for SO₂ calibrations/QC**
- Agilaire 8872 or comparable **data logger equipment** for data handling and storage from continuous monitors
- **Digital Temperature Sensor** for tracking shelter temperature
- **Modem** for polling data from data logger
- **Fencing with wide gate** will be added to the existing Georgetown site to secure the shelter and its contents
- **Gravel roadway and pad** will be added to the existing Georgetown site for shelter transport and placement.
- Update to **electrical service** at existing Georgetown site to provide electrical connection for shelter & monitoring equipment.

As stated above, this project aims to place air monitoring tools in the hands of the community living near Republic Steel. Since they have expressed frustration regarding their exposure to poor air quality and CCPH staff cannot always be in the neighborhoods to investigate emissions as they occur, the community will choose four Community Operators (COs) to take responsibility for air pollutant sensors. Sensors will be owned by CCPH and staff will be responsible for calibration, performing any QC, and training the COs on their use and care (including proper sampling technique and documentation). Purchases related to the sensor air monitoring in the communities include:

- **Purple Airs** – Five Purple Air sensors that are compatible with SD cards will be purchased; four will be placed in the community and one will be a spare housed at CCPH. The sensors will be mounted at locations decided with input from the residents. PM_{2.5} data will log continuously onto SD cards that will be downloaded at least weekly to retrieve data.
- **MultiRAEs** – Five MultiRAEs will be purchased; four will be placed in the community and one will be a spare housed at CCPH and used for complaint investigations. The MultiRAEs will be configured for SO₂ and VOCs and Community Operators will record concentrations on a frequency determined by community input, but

¹ C Henning, 2017, Analysis Report #2017-21-S, Canton City Public Health Laboratory Division

at least on the US EPA 1 in 6 schedule. COs will also be expected to document dates and times that odors are detected or visible emissions are observed coming from the facility with associated SO₂ and VOC readings taken during that time. CCPH will note PM_{2.5} data collected by the T640X and Purple Airs during periods of odors or emissions.

- **Logbooks** - One logbook will be purchased for each sensor.

Data Collection, Analysis & Distribution

PM₁₀, PM_{2.5}, SO₂, & Shelter temperature data from the continuous instruments at the Georgetown site will be collected by the Agilaire 8872. Ohio EPA software will poll the data hourly using modem equipment purchased with this grant and store the data in AirVision. CCPH will review the data daily to watch for elevated concentrations and any signs of possible equipment malfunction. Shelter temperature will be monitored to confirm that the FEM equipment is running at the temperatures recommended by the manufacturer. AirVision will be used to create reports for sharing with the public.

VOC data will be received in electronic format from the analytical lab and stored on the network at CCPH. CCPH will review the data as it is received and note any concentrations of concern. CCPH will create data reports for sharing with the public.

Purple Air data will be retrieved from the units' SD cards at least weekly and saved to the network at CCPH. It is not currently possible to upload data from the SD card to the Purple Air map. Data will be compared to the data from the T640X and reports will be created for sharing with the public. Since Purple Air data is historically biased high, CCPH would educate the community on potential inaccuracies and the use of algorithms in Purple Airs.

SO₂ and VOC sensor data will be documented by the COs into logbooks and uploaded weekly to a Microsoft TEAMS site. The logbooks and TEAMS site will be provided by CCPH. If a CO does not have easy access to the internet, CCPH staff will visit weekly to upload data. Data will be compared to the data from the T100 and TO-15 samples and reports will be created for sharing with the public.

All data will be reviewed and compiled into a sharable format by CCPH and shared on its website www.cantonhealth.org. All data with the exception of VOCs will be updated weekly. If elevated results are observed, data may be updated more often at the request of the community. VOC data will be updated as it is received; at least twice per month.

Section 2 – Community Involvement

Historically, many complaint calls and meetings with the community have involved CCPH staff on the receiving end of angry words and distrust. Although progress has been made, there is a level of frustration in the communities near Republic Steel. CCPH will build on existing relationships and make the community integral to this project.

All partners in this project are aware of the historical problems associated with this facility and will benefit by a reduction in complaints and stronger partnerships. Partners are as follows:

- Residents living closest to Republic Steel – The public meetings from 2017-2021 provided a dialogue between CCPH and the residents, and the input provided played a major role in the design of this project as articulated in this narrative. The residents will further participate by discussing with CCPH possible locations for sensors and choosing four residents in or near those locations willing to become Community Operators to actively collect data for the study. This application includes a letter of support from Mr. Pete Carpico, a science teacher residing in the target community, that makes CCPH aware of odors and visible emissions from Republic Steel and encourages neighbors to attend scheduled meetings. CCPH envisions Carpico being a community leader in this project.

- Ohio EPA – Ohio EPA meets with the APC division of CCPH on a regular basis regarding the air quality issues in the neighborhoods near Republic. Ohio EPA has also contracted with APC division of CCPH for the performance of air monitoring on behalf of Ohio EPA in Stark County and have ongoing involvement as part of that contract. They will be responsible for the following for this project:
 - Performing semi-annual flow rate audits as required by the QA Handbook Volume II, Appendix D for the PM_{2.5}/PM₁₀ sampler
 - Performing annual audits as required by the QA Handbook Volume II, Appendix D for the SO₂ sampler
 - Purchasing the modem's cellular service to transmit data from the data logger to AirVision. Ohio EPA staff will configure the FEM monitors in AirVision for CCPH use.
- City of Canton – Mayor Thomas Bernabei and City Council have attended every meeting hosted by CCPH regarding Republic Steel and have also heard first-hand community complaints during City Council meetings. The mayor serves on the CCPH Board and is supportive of this endeavor. The city cleared the parcel on which the Georgetown monitoring site is being installed and will continue to mow as needed at no charge.
- Canton Township – A small portion of Canton Township lies southeast of Republic Steel. Township trustees attend the public meetings hosted by CCPH and update constituents as needed.

Should this project be chosen for funding, CCPH will schedule a kick-off meeting in December 2022 to outline the details of the study to its partners and to get further input into the design and planning of the study. Postcards will be mailed to every household in the study area to announce the date and time of the meeting. CCPH will present an aerial of the study area and provide guidance to help residents make informed decisions for plans on where to place the sensors. The roles of the Community Operators will be explained with emphasis placed on the need for attention to detail and commitment. A brief survey, developed by CCPH, will be distributed at the meeting and made available to those who could not attend to assess the community's views regarding knowledge, level of trust, and partnerships with CCPH.

The Project Manager will train the four COs on proper use of the sensors and documentation. A document listing expectations and responsibilities of CCPH staff and the COs will be reviewed and signed by each party. Sensors will remain the property of CCPH. Calibrations and QC will be the responsibility of CCPH (see attached Quality Assurance statement).

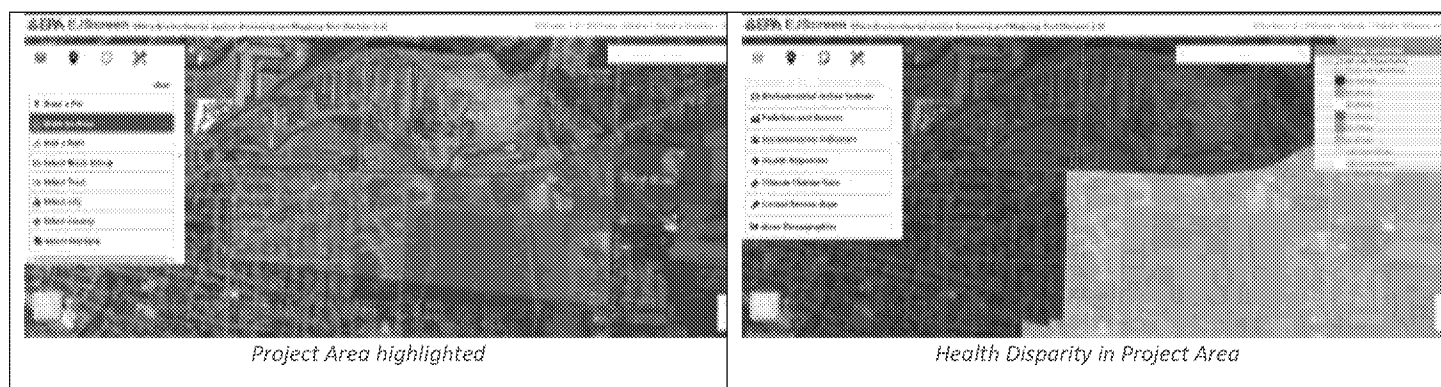
To promote transparency, routine meetings will be held on a quarterly basis to update residents on progress, provide education as needed (i.e. how to find data on the website, how to interpret data, etc), present comparisons between FEM and sensor data, and allow residents to provide input for project direction. Based on input from the residents, the frequency of these meetings may change. After the two-year study ends, the survey that was distributed at the kick-off meeting will be shared again to determine if the community has increased knowledge regarding air pollution in their area and if they feel a stronger sense of partnership and trust with CCPH.

Section 3 – Environmental Justice and Underserved Communities

Since Republic Steel owns much of the land west, north and east of the active portions of the facility, many of the emissions fall out on their property and do not reach surrounding communities. This proposal focuses on the residents living in approximately 1 square mile southeast and southwest of Republic Steel that do not have buffers between their homes and the currently active buildings of the steel manufacturer contributing to adverse impacts to the community. As the maps below demonstrate, the expanded monitoring network will service communities experiencing environmental justice concerns as evidenced by data shown by the EPA EJScreen tool. The communities in this study exceed the state 85th percentile for PM_{2.5} and ozone pollution, and air toxics cancer risk. The neighborhoods in the western one-third of the study area are in the 95-100 percentile for Low Life Expectancy, Heart Disease, and Asthma, with the remaining communities of the study area in the 80-90 percentile for these categories, showing disproportionate

health outcomes. Socioeconomically, the EJScreen tool indicates that the project area is in the state 88th percentile for people of color, 85th percentile for low income, and 96th percentile for unemployment rate.

During the COVID-19 pandemic, many products made overseas, including steel, were stuck on ships that were not able to dock and unload. When lockdowns eased and manufacturers began to operate at ‘normal’ capacity again, American companies began ordering more American-made steel so they would not be as reliant on foreign countries. For this reason, the number of orders received by Republic Steel in 2021 reached higher numbers than those received during recent pre-COVID years. At the same time, like much of the United States, contractors and vendors are experiencing staff shortages that are hampering abilities to make repairs to Republic’s buildings, upgrade equipment, and perform studies to determine the sources of pollutants and how to best mitigate them. In these ways, COVID-19 has exacerbated the environmental and health concerns in these communities.



Section 4 – Environmental Results – Outcomes, Outputs and Performance Measures

This project supports the EPA Strategic Plan Goal 4 and Objective 4.1 by requesting expanded air monitoring in low-income and marginalized community that has for decades been overburdened with air pollution, as described above.

The **expected outputs** from this project include:

- Identification of air pollution – This proposed monitoring project will allow the study of PM and SO₂ concentrations in the communities closest to Republic Steel. VOC data will identify any compounds that may be contributing to odors or the formation of PM.
- Community-specific assessments of air pollution data in underserved communities – The community will be encouraged to entrust the sensors with COs that are dispersed throughout the neighborhoods so that data may be collected from a variety of locations relative to the facility. This area ranks high using US EPA’s Environmental Justice tool.
- Pollutant concentrations will be made available to communities and other stakeholders on at least a weekly basis. The Purple Airs are made to glow colors that correlate with the current level of PM2.5, so communities could see at a glance the quality of the air in this respect.
- Stronger partnerships between the communities and CCPH – Although CCPH staff has developed partnerships with some members of this community, it is expected that these will expand in number and strength. There is a sense of government distrust from many residents and the goal is that more trusting relationships will form.
- Increased community knowledge through participation in monitoring and regular meetings. These residents have felt powerless for many years. This project will not only give them a voice in monitoring their air quality, it will provide them with a sense of empowerment.
- Progress reports and final report

The **expected outcomes** from this project include:

- Short-term Outcomes:
 - Increased access to information and tools that increase understanding of the environmental and human health risks of living in this community.
 - Identification of air pollution problems of which we are not yet aware
- Intermediate Outcomes:
 - The community will have access to data to make educated decisions about alleviating the burdens of living near this facility.
- Long-term Outcomes:
 - Depending on the data obtained during this study, Ohio EPA, local government, and/or responsible party may take action to mitigate the source of pollutants.
 - At the end of this 2-year study, the Purple Airs and MultiRAEs will remain in the community for use, so they'll have ongoing access to data and will know how it compares to data collected from federally-equivalent methods that were used at the Georgetown site. CCPH will make funds available to calibrate the sensors as needed.

Performance Measures and Plan

Output or Outcome	Performance Measure	Tracking Documentation
Identification of Air Pollution	Concentrations of PM2.5, PM10, SO2 and VOCs from FEM will be collected and compared to NAAQS.	Data summaries and reports
Community Specific Assessments of Air Data in underserved communities	Concentrations of PM2.5, SO2 and VOCs from Sensors placed throughout neighborhoods compared to FEM.	Photos, maps
Pollutant Concentrations made available to public/access to data	Data posted weekly on CCPH website, residents will be trained to find data	Screenshots, photos
Stronger partnerships	Distribute survey at kick-off meeting and again after 2-year study ends	Sign in sheets of community meetings, survey results
Increased knowledge	Distribute survey at kick-off meeting and again after 2-year study ends	Survey results
Mitigate source of pollutants	Actions taken to mitigate source of pollution, if necessary	Meetings, action documents

Timeline and Milestones (assuming receipt of award 11/30/2022):

Expenditures and project progress will be tracked, measured and reported by means listed in chart above and below and per Sections 5 and 7. Excel sheets, a TEAMs site, and organization of files will be used to document progress and provide audit trail. It is understood that the deadlines for quarterly reports are estimated and that US EPA will establish all dates for quarterly and final reports.

Deadline	Milestone	Performance Measurement
12/15/2022	Meet with community to inform them of the award and associated activities that will occur. Discuss expectations of each involved party.	Sign-in sheet and summary of meeting
1/6/2023	Bid as applicable and submit orders for shelter, fencing, monitoring equipment, air sensors, data logger and associated equipment	Order Confirmations
1/6/2023	Receive names from community of Community Operators	Names and Contact Information of Community Operators
2/27/2023	Procure monitoring equipment, air sensors	Packing lists and invoices
Feb, May, Aug, Nov in years 2023-2025	Submit quarterly report to US EPA	Use US EPA-required forms

Deadline	Milestone	Performance Measurement
3/6/2023	Begin training of CCPH staff on operation of monitoring equipment and air sensors	Reports from Time Accounting System (TAS)
3/15/2023	Meet with community to update on progress	Sign-in sheet and summary of meeting
3/24/2023	Procure shelter and fencing, complete any needed electrical adaptations	Invoices, photos
4/7/2023	Move shelter to Georgetown monitoring site	Photos
4/21/2023	Install equipment in shelter at Georgetown, Ohio EPA set up files in AirVision and perform test polling	Photos, reports from TAS, AirVision screenshots, emails
4/26/2023	Calibrate sensors as appropriate, install Purple Airs, train Community Operators on use of Multi RAEs, documentation and TEAMS site	Photos, signed list of expectations
4/28/2023	Calibrate equipment, run Quality Control, Go live with all monitoring equipment and sensors	Calibration and QC data, ambient data
5/5/2023	Create flyer with instructions on how to obtain data from CCPH website, distribute throughout neighborhoods	Flyer, photos
5/8/2023 and every week thereafter	Set up page on CCPH website for sharing data and post data through 5/7/2023, continue posting data every week thereafter	Screenshots
Between 6/15/2023 – 6/15/2025, each month of March, June, September, and December in years 2023-2025.	Meet with community to update on data and answer questions, provide education	Sign-in sheet and summary of meeting
6/15/2024	If PM _{2.5} , PM ₁₀ , SO ₂ , or VOC data are elevated, discuss with Ohio EPA possible continuation of monitoring for said pollutant(s) past the 2-year study period and addition to Annual Monitoring Network Plan/Ohio EPA grant	Emails, summary of meeting(s)
5/8/2025	If data has met NAAQS, perform final QC on monitoring equipment; remove shelter and associated equipment from site	QC data, Photos, TAS reports
3/31/2026	Submit final report to US EPA	Use US EPA-required forms

Section 5 – Quality Assurance Statement – see attached statement submitted using Optional Attachment form.

Section 6 – Programmatic Capability and Past Performance

Past Performance: Since the 1970's, the APC Division of CCPH is funded through a grant/cooperative agreement with Ohio EPA which includes a combination of state funding and federal pass-through funding (for Section 103 and Section 105 federal funds) for the performance of air monitoring, inspections, permitting, and other air pollution activities as an Ohio EPA Local Air Agency. Ohio EPA has a direct cooperative agreement with U.S. EPA for the receipt of the federal funding, and the requirements of that agreement are included in the agreement between CCPH and Ohio EPA for the use of the pass-through federal funds and the state funds by CCPH. CCPH has well established work practices (see section 7 for details) to ensure completion and tracking of the agreement activities and the proper use of the various funding types for the activities. The fiscal records and activity reports have undergone several audits showing success. The CCPH APC's work practices are consistent with and supported by the CCPH's Fiscal Officer. In addition to CCPH APC's past performance, the Fiscal Officer has experience in managing funds for state grants each year (including Ohio Department of Health and Ohio EPA), some of which include federal pass-through funds, which have undergone several audits showing success.

Reporting Requirements: The APC/Ohio EPA agreement and the other CCPH grants mentioned above have a history of successfully meeting the quarterly and annual reporting requirements for expenditures in a timely and accurate manner. Those agreements also have a history of regular reporting of the outputs and outcomes (e.g. activities) of those agreements in a timely and accurate manner. All reports submitted, including final technical reports, have been accepted by the funding provider.

Staff Expertise:

The Monitoring and Inspections Supervisor, Linda Morckel, will serve as the Administrator and Project Manager for this grant. Linda Morckel has 10 years of experience in Air Pollution Control and 13 years of experience in Solid Waste Management and Recycling. Both of these roles have provided experience in administering state and local grants and the planning and execution of various projects. She has been CCPH's primary contact with the residents living near Republic Steel. She also has experience with the fiscal responsibilities for the Ohio EPA cooperative agreement.

The Monitoring and Inspections Technicians have varying degrees of experience ranging from 2 months to 10 years. All pay great attention to detail and take pride in their work. US EPA Region 5 performed Technical System Audits at CCPH in 2012, 2016 and 2019 with favorable outcomes.

The Air Pollution Control Director has 11 years of experience in that position which is responsible for all the Ohio EPA cooperative agreement negotiating, compliance, tracking, budgeting, and reporting for agreement outputs and expenditures. The Director will provide support to Linda's Administrator role for this grant.

The CCPH Fiscal Officer, Christi Allen, has 25 years of accounting experience and successfully manages funds for all seven CCPH Divisions. Christi will provide support for this grant by receiving funds.

Section 7 – Budget

Budget Detail:

- Personnel

There are three full-time staff that are planned to perform work directly for the project: One Monitoring & Inspections Technician ("Technician"); one Monitoring & Inspections Supervisor ("Supervisor"); and one Director. Each of these staff will only spend a portion of their total time (see full time equivalents (FTE) below) on the project to fulfill the project needs. The budget anticipates annual salary adjustments and increases consistent with the CCPH compensation plan. Accordingly, since this project starts in calendar year 2022 and ends in 2026, there are different salaries for each staff each year.

Personnel Table

Staff position	Year	Annual salary	Hourly Salary	Fringe Benefits Rate	Project Hours	Project FTE
Technician	2022	\$48,091	\$23.12	50.35%	4	0.0019
Technician	2023	\$53,091	\$25.52	41.81%	287	0.1380
Technician	2024	\$54,684	\$26.29	41.34%	229	0.1101
Technician	2025	\$56,325	\$27.08	40.88%	130	0.0625
Supervisor	2022	\$54,557	\$26.23	47.43%	40	0.0192
Supervisor	2023	\$59,557	\$28.63	45.61%	282	0.1355
Supervisor	2024	\$61,344	\$29.49	45.03%	188	0.0904
Supervisor	2025	\$63,184	\$30.38	44.47%	140	0.0671
Supervisor	2026	\$65,080	\$31.29	43.92%	10	0.0048
Director	2022	\$69,437	\$33.38	38.02%	34	0.0163
Director	2023	\$74,437	\$35.79	37.20%	64	0.0308
Director	2024	\$76,670	\$36.86	36.86%	33	0.0159
Director	2025	\$78,970	\$37.97	36.54%	27	0.0130
Director	2026	\$81,339	\$39.11	36.22%	10	0.0048

- Fringe Benefits

All full-time are provided the following fringe benefits:

- Benefits as a percentage of salary:
 - Ohio Public Employee Retirement System (OPERS) [pension] @ 14.0%
 - Worker's Compensation @ 3.10%
 - Medicare @ 1.45%
 - Compensated Leave Fund @ 7.19%
- Fixed cost benefits:
 - Life Insurance @ \$120/yr
 - Health Insurance with different annual costs depending on coverage selected by staff: \$8,400/yr for single coverage; \$11,700/yr for single+1 coverage; and \$15,600/yr for family coverage.

The fringe benefits rate shown in the table above was calculated by first determining the total fringe benefit cost per hour by multiplying the hourly salary by the benefits percentages and then adding the fixed cost benefits as hourly rates. The total fringe benefit cost per hour was then divided by the hourly salary to get the fringe benefits rate as a percentage of salary.

When calculating the fringe benefits expenses, the fringe rate is multiplied by the salary attributable to direct project work, so the fringe expenses are direct project related.

- Travel - None

Vehicles used for the project are owned by CCPH. This monitoring site is 4 miles round-trip from the office and work at the site also includes SLAMS monitoring, so travel expenses are shared with other funded work. Additionally, training planned for the project requires no overnight accommodations due to close proximity to office and the use of CCPH owned vehicle. Since these project-related travel expenses are expected to be minimal, they are not included as part of this project.

- Equipment

See the itemized equipment list in the budget table below and in Section 1. None of these items include labor costs. All of these items are necessary for the performance of the project work. CCPH proposes to purchase all new equipment to keep repair costs low since equipment will be covered by warranties and to allow the equipment life to go beyond the length of the grant to continue project work in the community. Equipment used for quality checks for PM₁₀/PM_{2.5} monitor and certification of temperature devices are already owned by CCPH so not required to be purchased for this project.

- Supplies

See the itemized supply list in the budget table below. All of these items are necessary for the performance of the project work. Community outreach materials will be created and printed using CCPH equipment, community meetings will use CCPH presentation equipment, and data reporting will use existing CCPH Microsoft O365 and website resources, so these costs are covered by other funding.

- Contractual – None

None of the project work involves expenses that meet the “contractual” budget category.

- Other

See the itemized other list in the budget table below. Expenses included in the other budget category include: utilities; laboratory analysis services; certification services; rentals; and services for installing electrical, fencing, and gravel at the monitoring site. These items did not fit into other budget categories per CCPH interpretation. This categorization is also consistent with how these expenses are categorized for Ohio EPA agreement and the

City procurement system. There will be no subrecipients community participant support costs for this project. Community meetings will be held at locations free of charge.

- **Indirect Charges – None**

CCPH will not include indirect charges for this project. This decision is to be consistent with CCPH historically not including indirect charges for its Ohio EPA agreement work.

Budget Table

Line Item & Itemized Cost	EPA Funding
Personnel	
One (1) Technician at the hourly salary and project hours for the years 2022-2025 as detailed in the personnel table.	\$16,944
One (1) Supervisor at the hourly salary and project hours for the years 2022-2025 as detailed in the personnel table.	\$19,206
One (1) Director at the hourly salary and project hours for the years 2022-2025 as detailed in the personnel table.	\$6,047
TOTAL PERSONNEL	\$42,197
Fringe Benefits	
One (1) Technician at the fringe benefits rate based on project salary for the years 2022-2025 as detailed in the personnel table and fringe benefits section.	\$7,031
One (1) Supervisor at the fringe benefits rate based on project salary for the years 2022-2025 as detailed in the personnel table and fringe benefits section.	\$8,695
One (1) Director at the fringe benefits rate based on project salary for the years 2022-2025 as detailed in the personnel table and fringe benefits section.	\$2,245
TOTAL FRINGE BENEFITS	\$17,971
TOTAL TRAVEL	\$0
Equipment	
One (1) small semi-mobile shelter to house the continuous analyzers and calibration/Quality Control equipment for climate-control	\$89,915
One (1) Teledyne T100 continuous monitor or comparable equipment to monitor SO2	\$17,073
One (1) Agilaire 8872 for SO2, PM10, PM2.5 continuous monitor data handling and storage	\$8,000
One (1) T701 Zero Air System or comparable equipment to provide zero air for SO2 calibrations/QC	\$8,600
One (1) T700 Dynamic Dilution Calibrator or comparable equipment to calibrate SO2 and perform QC	\$14,000
One (1) Teledyne T640X continuous monitor or comparable equipment to monitor PM2.5 and PM10	\$40,000
TOTAL EQUIPMENT	\$177,588
Supplies	
SO2 continuous monitor spare parts	\$1,000
Two (2) Digital Temperature Sensor for tracking shelter temperature (primary and spare)	\$500
One (1) modem with antenna to transmit pollutant and temperature data from data logger to Ohio EPA's Air Vision software for data reporting and storage	\$740
FEP Sample line for SO2 continuous monitor	\$100
Sampling line shepherds hook for SO2 continuous monitor	\$80
Sampling line PTFE filters and filter holders for SO2 continuous monitor	\$750
PM10/PM2.5 continuous monitor spare parts and span dust	\$900
Two (2) VOC Canister sampling timer (primary and spare)	\$320
Five (5) Purple Air sensors for PM2.5	\$1,600
Five (5) MultiRae sensors for SO2 and VOC	\$17,500
Calibration Gas for MultiRae quality checks and calibrations (VOCs)	\$250
Twenty (20) SD Cards for sensor data storage	\$400
Fifteen (15) Logbooks for documentation for pollutant monitors, sensors, calibrators, and site.	\$320
EPA Protocol Gas for SO2 monitor quality checks and calibrations	\$1,000
Postage for community meeting notices and information flyers	\$664
TOTAL SUPPLIES	\$26,124
TOTAL CONTRACTUAL	\$0

Line Item & Itemized Cost	EPA Funding
Other	
Installation of Fencing with wide gate at monitoring site by service provider; necessary to accommodate shelter.	\$4,000
Installation of gravel roadway and pad at monitoring site by service provider; necessary for shelter transport and placement.	\$1,000
Installation of electrical service connection to shelter at monitoring site by service provider; necessary for electrical supply to monitoring/calibration equipment housed in shelter.	\$1,500
Dilution calibrator annual certification services by qualified vendor; two times during project.	\$2,000
EPA Protocol Gas Tank Rental for 2 years	\$720
VOC Canister sample laboratory analysis services for 2 years	\$18,300
TO-15 Canisters and flow regulator equipment rentals for 2 years for VOC sampling	\$9,455
Utilities: Electrical service for shelter/equipment at monitoring site for 2 years	\$1,920
TOTAL OTHER	\$38,895
TOTAL INDIRECT	\$0
TOTAL FUNDING	\$302,775
TOTAL PROJECT COST	\$302,775

Reasonableness of Costs: All costs included are reasonable and necessary to accomplish the proposed goals, objectives, and measurable outcomes of this project, as further detailed in the budget detail, budget table, Section 1 and Section 2 above. Only costs for items not already available to CCPH are included. None of the costs are ineligible costs as described in the RFA.

Expenditure of Awarded Funds:

As described in Section 6, CCPH APC staff have expertise in proper management of grant/cooperative agreement funds through Ohio EPA's cooperative agreement. The approach described below is the same approach that has been used for numerous years for the Ohio EPA agreement funds; it has undergone several audits showing success. Any awarded funds will be expended in a timely and efficient manner in accordance with the below approach and timeline in Section 4.

Once awarded, unique Time Accounting System (TAS) categories for the project funds will be created for staff use to record daily their direct activity time for the project. The daily TAS data is reviewed once every 2-weeks by supervision to ensure appropriate category use. Quarterly, the TAS data will be compiled and data for the unique project categories will be used to calculate actual personnel and fringe costs expenses.

Staff will obtain quotes for equipment and contractual purchases and get purchase orders issued to vendors following EPA's Best Practice for Procuring Services, Supplies, and Equipment under EPA Assistance Agreements. All equipment, supplies, and services received will be confirmed by project staff. All invoices received will be reviewed and approved by project staff to ensure charges are for equipment, supplies, and/or services received at agreed upon rates. Expenses will be tracked in City procurement system under fund accounts specific to Air Pollution Control. Reports of non-personnel costs will be pulled monthly from the City procurement system and itemized into appropriate expense categories. This data will be used to generate the quarterly expenditure reports for the project.

March 21, 2022

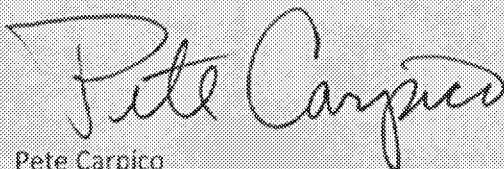
Canton City Public Health
Ms. Terri Dzienis
420 Market Ave N
Canton, Ohio 44702

I have lived in the Georgeview Estates neighborhood since I bought my house new in August of 2003. Shortly after moving into our house with my wife and two children, Republic Steel resumed operation at their site on Georgetown Road. Ever since that time, my property, family and neighborhood have all been bombarded with pollutants in the form of fallout of particulates, terrible odors and visible emissions coming from Republic Steel's operation. I began expressing my concerns to my local city council members and started providing observations of the mill to Canton City Public Health. Over these years, I have attended numerous public meetings hosted by the Ohio EPA, City Council, Canton City Mayor, Ohio State Representative and CCPH that I have grown to know many of the people who are trying to help on a first name basis. Throughout this time, I have found the Canton City Public Health representatives to be great resources for our neighborhood as we continue to be concerned about the emissions at Republic Steel and the potential health and property damage that it may cause.

Although CCPH continues to monitor lead and heavy metals from Republic Steel, I believe that more needs to be done. The people who live in Georgeview Estates, the rest of Ward 4 in the City of Canton and those in Canton Township near the mill are all being exposed to pollutants daily based on their proximity to this mill. When I heard that CCPH was applying for this grant as part of the American Rescue plan and the funds would be used to add additional data to work toward improving the air quality in our neighborhoods, I immediately knew that I would do whatever I could to help. I support this CCPH grant application as it will expand air monitoring services in our community. I especially like that the residents will be able to play an active role by providing input to CCPH and by utilizing portable air sensors to help identify pollutants whenever emissions are observed, which is often after business hours or on weekends. As an impacted resident and a member of the Georgeview Neighborhood Association, I can ensure that many residents will be interested in helping with the monitoring of Republic Steel once this grant is funded. Our community has weathered the storm of repeated emissions from this mill and continues to work with CCPH as well as any other political organizations that will help our cause. The residents have shown that they are willing to help in any way possible to better understand the impacts of these continued emissions. We are an interested, engaged and informed community that will gladly expand our cooperation with CCPH to make a positive impact on the air quality around the mill.

I support this grant application and look forward to hearing of this much needed funding in support of our efforts to breathe easier.

Thank you for your consideration.

A handwritten signature in black ink that reads "Pete Carpico". The signature is fluid and cursive, with the first name "Pete" and last name "Carpico" clearly distinguishable.

Pete Carpico
391 Whitetail Tr NE
Canton, Oh 44704



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

March 17, 2022

Terri Dzienis
Director, Air Pollution Control Division
Canton City Public Health
420 Market Ave N
Canton, OH 44702

Dear Ms. Dzienis:

On behalf of Ohio EPA, please accept this Letter of Commitment as confirmation of our participation in Canton City Public Health's (CCPH) Enhanced Air Monitoring Project.

The Enhanced Air Monitoring Project will expand Canton's ambient air monitoring network into a community living near a leaded steel manufacturer. CCPH will use Federal Equivalent Methods (FEM) for particulate matter and sulfur dioxide (SO₂), and will collect canister samples for volatile organic compounds (VOCs). Members of the community will be trained to operate low cost air quality sensors to collect data that will be compared to the FEM data and help to better understand the air pollution within the community. CCPH is already sampling for lead and metals in the area.

CCPH has been hosting public meetings since 2017 for communities living near the facility and this Enhanced Air Monitoring Project is based on input from the residents. This community experiences environmental justice concerns as evidenced by health disparity data, proximity of known air pollution sources, resident demographics, and communities that exceed the 85th percentile in various air pollution categories of the EPA EJ Screen Tool. The FEM monitors will be housed in a mobile shelter, which will enable this project to extend into other communities after the three-year project period of the Enhanced Air Quality Monitoring for Communities funding opportunity available under RFA Number: EPA-OAR-OAPQS-22-01.

The Ohio EPA Division of Air Pollution Control (DAPC) commits to ensuring success of the Enhanced Air Monitoring Project by:

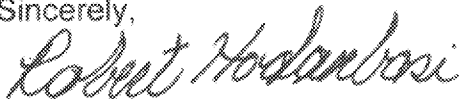
1. Ohio EPA DAPC will perform semi-annual flow rate audits as required by the QA Handbook Volume II, Appendix D, for the Teledyne T640 in the trailer-mounted shelter. Audits will be performed for a period of 2 years.
2. Ohio EPA DAPC will perform an annual audit as required by the QA Handbook Volume II, Appendix D, for the SO₂ monitor in the trailer-mounted shelter. Audits will be performed for a period of 2 years.
3. Ohio EPA DAPC will assist CCPH in accessing the States' Air Vision Software. CCPH will purchase the modem and Ohio EPA will pay for the modem's cellular service to

transmit data from an Agilaire Data-Logger to Air Vision. CCPH will utilize Air Vision to handle and report data that is generated from the trailer-mounted monitoring site.

Ohio EPA is not requesting any compensation for our assistance under CCPH's Enhanced Air Monitoring Project.

Ohio EPA fully supports the goals of CCPH's Enhanced Air Monitoring Project. We look forward to working with the CCPH Division of Air Pollution Control to improve health outcomes for City of Canton residents by expanding the region's air quality network. Please contact me at (614-644-3585) with any questions.

Sincerely,

A handwritten signature in cursive script, reading "Robert F. Hodanbosi".

Robert F. Hodanbosi P.E.
Chief, Division of Air Pollution Control, Ohio EPA



THE CITY OF
CANTON

THOMAS M. BERNABEI, MAYOR

March 15, 2022

Canton City Public Health
Mr. James Adams, Health Commissioner
420 Market Avenue North
Canton, OH 44702

Dear Commissioner Adams,

It is my pleasure to provide this letter of support for the Canton City Public Health's grant application for expanding air monitoring services in the Canton community. These services will not only gather more data on air quality but also increase engagement with the community and address their concerns to foster a positive working relationship of trust. As part of this support, the City of Canton will provide mowing services for the air monitoring site through its Street Department.

I have represented the City of Canton in regular public City Council meetings and in community meetings regarding the steel manufacturing facility operated by Republic Steel. I have heard first-hand the community concerns of air quality for numerous years and addressing these concerns is a priority for the City.

I am confident expanding Canton's air monitoring services will make a significant impact on the air quality concerns of our residents.

Please feel free to contact me at 330-438-4300 with any questions or concerns. Thank you.

Sincerely,

Thomas M. Bernabei
Mayor





Canton Township Board of Trustees

4711 Central Avenue SE Canton, Ohio 44707

Phone (330) 484-2501

Fax (330) 484-2556

www.cantontwp-oh.gov

Mark R. Shaffer
President

Christopher B. Nichols
Vice President

Keith J. Hochadel
Trustee

John E. Ring
Fiscal Officer

March 24, 2022

Canton City Public Health
Mr. James Adams, Health Commissioner
420 Market Avenue North
Canton, OH 44702

Dear Commissioner Adams,

The intent of this letter is to give our support for the Canton City Public Health's grant application for expanding air monitoring services that would greatly benefit residents in the Canton Township community. These services will not only compile more data on air quality but foster community involvement.

We have attended public meetings and heard the concerns from residents for many years. Addressing the concerns over the lead emissions from Republic Steel is a priority for Canton Township.

We are confident expanding Canton's air monitoring services will make a significant impact on the air quality concerns of our residents.

Sincerely,

Mark R. Shaffer, President

Christopher B. Nichols, Vice President

Keith J. Hochadel, Member

A PROUD FAMILY COMMUNITY

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